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TIFFENY NANCE

[Additional Counsel Listed on Following Page]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TIFFENY NANCE, on behalf of herself
and the Class Members,

Plaintiff,

vs.

RYDER INTEGRATED LOGISTICS,
INC., a Delaware Corporation; and RYDER
SYSTEM, INC., a Florida Corporation,

Defendants.

Case No. 2:23-cv-00477-TLN-JDP

[Assigned to the Honorable Troy L.
Nunley]

**STIPULATION AND ORDER TO
STAY DISCOVERY FOR SIXTY
DAYS AND EXTEND
PLAINTIFF'S CLASS
CERTIFICATION DEADLINE BY
SIXTY DAYS**

Complaint Filed: March 13, 2023
Trial Date: None

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RYDER INTEGRATED LOGISTICS, INC.
8 and RYDER SYSTEM, INC.

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1 Plaintiff Tiffeny Nance (“Plaintiff”) and Defendants Ryder Integrated Logistics, Inc.
2 and Ryder System, Inc. (collectively, “Ryder”) (together the “Parties”), by and through their
3 undersigned counsel, hereby enter into the below stipulation with reference to the following
4 facts:

5 WHEREAS, on March 13, 2023, Plaintiff filed her class-action complaint for
6 damages against Ryder in the United States District Court for the Eastern District of
7 California, captioned *Tiffeny Nance v. Ryder Integrated Logistics, Inc. et al.*, Case No.
8 2:23-cv-00477 (Plaintiff’s “Class Action”);

9 WHEREAS, as relevant here, there are currently two related cases pending
10 against Ryder in the United States District Court for the Northern District of California:
11 *Perkins v. Hadco Santa Fe Springs CA dba Ryder Integrated Logistics, Inc.*, Case No.
12 3:23-cv-00502-WHO & 3:23-cv-01694-WHO (“*Perkins*”) and *Jose Johnson, et al. v.*
13 *Ryder Transp. Solutions, LLC*, Case No. 4:22-cv- 07456-JST (“*Johnson*”);

14 WHEREAS, on October 24, 2023, Ryder and the parties in the *Perkins* and
15 *Johnson* actions participated in a successful mediation and agreed to a settlement in
16 principle that, by definition, Ryder states encompasses the putative class and claims
17 alleged in Plaintiff’s Class Action;

18 WHEREAS, the Parties previously stipulated to extend the Phase I Discovery
19 Cutoff deadline by sixty days to March 12, 2024; and

20 WHEREAS, on January 3, 2024, the Parties stipulated to stay discovery in this
21 case by thirty days in exchange for Ryder providing the executed Settlement
22 Agreement to counsel in this case when it is fully executed, to give the Parties time to
23 meet and confer regarding the impact of the *Perkins/Johnson* settlement on this case.

24 WHEREAS, in response to the Parties’ stipulation, on January 3, 2024, the Court
25 signed an order staying discovery for thirty days;

1 WHEREAS, on February 1, 2024, the Parties stipulated to stay discovery for
2 another thirty days and to extend Plaintiff's deadline to file a motion for class
3 certification by sixty days, as the *Perkins/Johnson* settlement had not been fully drafted;

4 WHEREAS, in response to the Parties' stipulation, on February 1, 2024, the
5 Court signed an order staying discovery for thirty days and extending the deadline for
6 Plaintiff to file a motion for class certification by thirty days, making the current
7 deadline for Plaintiff to file her motion September 6, 2024;

8 WHEREAS, on February 29, 2024, the Parties stipulated to stay discovery for
9 another thirty days and to extend Plaintiff's deadline to file a motion for class
10 certification to October 7, 2024, as the *Perkins/Johnson* settlement was still undergoing
11 revisions but near completion;

12 WHEREAS, in response to the Parties' stipulation, on February 29, 2024, the
13 Court signed an order staying discovery for thirty days and extending the deadline for
14 Plaintiff deadline to file a motion for class certification to October 7, 2024;

15 WHEREAS, later that day, the Parties to the *Perkins/Johnson* matter executed
16 settlement agreement, a copy of which was provided to Plaintiff's counsel;

17 WHEREAS, the plaintiffs' counsel in the *Perkins/Johnson* matter has
18 represented to Ryder that they intend to file their forthcoming Motion for Preliminary
19 Approval by April 5, 2024, for which a hearing will likely be scheduled in May or June
20 2024 before the Honorable William H. Orrick of the United States District Court for
21 the Northern District of California;

22 WHEREAS, the Parties agree that discovery in this case and all accompanying
23 deadlines should be stayed through the Court's hearing and subsequent ruling on the
24 plaintiffs' Motion for Preliminary Approval in the *Perkins/Johnson* matter to determine
25 its impact on this case;

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1 WHEREAS, the Parties agree that discovery in this case should be stayed for an
2 additional sixty days and Plaintiff should receive a commensurate sixty day extension
3 of her deadline to file a motion for class certification;

4 IT IS HEREBY JOINTLY STIPULATED AND AGREED, by and between the
5 Parties through their respective counsel of record that:

6 1. The Parties agree that this Court enter an Order to stay all current and
7 pending discovery in this case for sixty days.

8 2. The Parties agree that this Court enter an Order extending Plaintiff's
9 deadline to file a motion for class certification by sixty days, to December 30, 2024.

10
11 **IT IS SO STIPULATED.**

12 Dated: April 2, 2024

SCHNEIDER WALLACE
COTTRELL KONECKY LLP

13
14 By: /s/ Eugene Zinovyev

15 Carolyn H. Cottrell
16 Ori Edelstein
17 Eugene Zinovyev
18 *Attorneys for Plaintiff*
TIFFENY NANCE

19 Dated: April 2, 2024

REED SMITH LLP

20
21 By: /s/ Tanner J. Hendershot

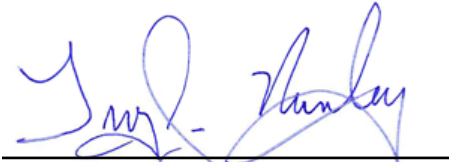
22 Mara D. Curtis
23 Rafael N. Tumanyan
24 Tanner J. Hendershot
25 *Attorneys for Defendants*
RYDER INTEGRATED LOGISTICS, INC.
26 and RYDER SYSTEM, INC.
27

ORDER

Pursuant to the above Stipulation, and good cause appearing, **IT IS SO ORDERED** as follows:

1. All current and pending discovery in this case is stayed for sixty days.
2. Plaintiff's deadline to file a motion for class certification is extended by sixty days to December 30, 2024.

Dated: April 2, 2024


Troy L. Nunley
United States District Judge